

# Exhibit B



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File Number:

October 8, 2018

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**VIA EMAIL**

Evan Janush  
The Lanier Law Firm, PLLC  
Tower 56  
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New York, NY 10022

**Re: *Noramco Production***

Dear Evan:

I have received your October 4, 2018 letter seeking documents concerning Noramco's "manufacturing of opioid products and Noramco's sales of opioid products." At the outset, your statement that "[w]e have learned that, until 2016, Johnson & Johnson owned Noramco" suggests this is a new factual development that you have discovered. Any such suggestion is at odds with Plaintiffs' own complaints. The amended complaints, filed on May 17 (Cleveland), May 18 (Cuyahoga), and May 25 (Summit), 2018, each name Noramco as a defendant and allege: "Defendant Noramco, Inc. ('Noramco') is a Delaware company headquartered in Wilmington, Delaware, and was a wholly owned subsidiary of J&J and its manufacturer of active pharmaceutical ingredients until July 2016 when J&J sold its interests to SK Capital." Cleveland SAC ¶ 53, Cuyahoga SAC ¶ 53, Summit SAC ¶ 80.

In other words, Plaintiffs have known about Noramco since before the filing of the amended complaint—presumably from the pre-suit investigation necessary before naming Noramco as a defendant.

Regardless, Noramco is a wholly separate and unaffiliated company, represented by different attorneys in this litigation. Plaintiffs have named Noramco as a defendant in this litigation, and we respectfully direct you to Dan Jarcho and Cari Dawson of Alston & Bird, Noramco's counsel.



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Sincerely,

*/s/ Amy R. Lucas*

Amy R. Lucas